

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RAZHDEN SHULAYA, and  
AVTANDIL KHURTSIDZE,

Defendants.

**Declaration**  
S9 17 Cr. 350 (KBF)

I, Andrew Thomas, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an Assistant United States Attorney in the Southern District of New York and one of the attorneys with responsibility for the investigation and prosecution of this case. I respectfully submit this declaration in support of the Government's motions *in limine* filed on April 23, 2018.

2. Attached hereto as Exhibit A is a photograph depicting, among other things, a Mercedes sedan. Based on conversations with a special agent of the Federal Bureau of Investigation ("FBI"), I have learned that the Mercedes sedan depicted in Exhibit A is one of the luxury vehicles used by Razhden Shulaya and that Exhibit A was taken on or about February 2, 2017.

3. Attached hereto as Exhibit B is a photograph depicting a case of Johnny Walker Black. Based on conversations with an FBI agent, I have learned that a confidential source delivered a substantially identical case of Johnny Walker Black to Shulaya as a tribute payment on or about December 22, 2016.

4. Attached hereto as Exhibit C is a photograph of a handwritten document bearing the date “May 13” at the top of the document. Based on conversations with a particular confidential source (“CS-2”) and a review of CS-2’s debriefings, I have learned that Exhibit C is one of many ledgers created to document the money bet, money won, money raked by the house, expenses paid, and losses owed as a result of a poker game hosted at the Shulaya Enterprise’s poker house. Ex. C was created on or about May 13, 2016 during a game hosted at the Shulaya Enterprise’s poker house.

5. Attached hereto as Exhibit D is a true and correct copy of a medical file obtained by the Government during the course of the investigation. Exhibit D is submitted under seal and pursuant to the terms of the Court’s Protective Order.

6. Attached hereto as Exhibit E is a true and correct copy of a February 3, 2016 letter addressed to Special Agent Robert J. Hanratty. Exhibit E is submitted under seal and pursuant to the terms of the Court’s Protective Order.

7. Attached hereto as Exhibit F is a true and correct copy of a February 3, 2016 letter addressed to Special Agent Naushaun C. Richards. Exhibit F is submitted under seal and pursuant to the terms of the Court’s Protective Order.

8. Attached hereto as Exhibit G is a true and correct copy of an order entered in *United States v. Bulamun*, No. 12 Cr. 794 (RBK) (D.N.J. April 26, 2017) at ECF Doc. 80.

Dated: New York, New York  
April 23, 2018



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Andrew Thomas  
Assistant United States Attorney  
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